

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ALLIANCE FOR AUTOMOTIVE INNOVATION,

Plaintiff,

v.

MAURA HEALEY, ATTORNEY GENERAL OF  
THE COMMONWEALTH OF  
MASSACHUSETTS in her official capacity,

Defendant.

CIVIL ACTION  
NO. 1:20-cv-12090-DPW

**FURTHER MODIFIED STIPULATION**

The Office of the Attorney General stipulates that it does not intend to, and will not, issue the notice discussed in Section 4 of the Data Access Law until after the Court rules on counts 1 and 2 of the plaintiff's complaint. Similarly, the Office of the Attorney General stipulates that it does not intend to, and will not, exercise its enforcement authority under Chapter 93A, Chapter 93K, or otherwise, to enforce any provision of the Data Access Law until after the Court rules on counts 1 and 2 of the plaintiff's complaint. The Office of the Attorney General reserves the right to revise this stipulation in the event that adjudication of those claims is delayed beyond November 2, 2021, but further stipulates that it will do so only after first providing 14 days' advance notice to the plaintiff and the Court of its intent to do so.

Respectfully submitted,

ATTORNEY GENERAL  
MAURA HEALEY

By her attorneys,

September 17, 2021

/s/ Eric A. Haskell  
Robert E. Toone, BBO No. 663249  
Eric A. Haskell, BBO No. 665533  
Phoebe Fischer-Groban, BBO No. 687068  
Assistant Attorneys General  
Christine Fimognari, BBO No. 703410  
Special Assistant Attorney General  
Office of the Attorney General  
One Ashburton Place  
Boston, Mass. 02108  
(617) 963-2589  
eric.haskell@mass.gov

**CERTIFICATE OF SERVICE**

I certify that a true copy of this document will be sent electronically by the ECF system to attorneys of record identified on the Notice of Electronic Filing.

/s/ Eric A. Haskell

September 17, 2021

Eric A. Haskell  
Assistant Attorney General